REMARKS

I. STATUS OF THE CLAIMS

The Examiner has rejected each of the pending claims. Independent claims 1 and 52 are amended herein. Support of the amended claims can be found, for example, on page 19, line 11 thru page 20, line 21 of the specification. In view of the above, it is respectfully submitted that claims 1, 52, 53, and 56-59 are pending and under consideration.

No new matter is being presented, and approval and entry are respectfully requested.

II. CLAIMS 1, 52, 53 AND 56 – 59 ARE REJECTED UNDER 35 U.S.C. § 103(a) AS BEING UNPATENTABLE OVER HOGHOOGHI ET AL. (US 5,959,260) IN VIEW OF MURAMATSU ET AL. (US 6,477,391).

The Examiner has rejected independent claims 1 and 52 asserting that Hoghooghi et al. (Hoghooghi) discloses a mobile phone carried by an authorized user wherein the battery pack and the main body operate together to allow biometric or user verification (handwriting) information of a user of the mobile phone to be input to the main body from outside the mobile phone for biometric verification purposes (handwriting) by being input to the batter pack through the I/O section and being input to the main body from the battery pack through the interface section. (citing Figures 1 and 5, col. 4, line 18; col. 5, line 43; and col. 6, lines 25-43 of Hoghoogi).

However, as an example, the amended claim 1 recites in part, *a battery pack having an input/output section integrally formed therewith* ***performing a user verification function using input/output signals comprising biometric information*** *of a user of the mobile phone.* For example, claim 1 also provides *the* ***user verification function verifies the identity of an authorized user*** *of the mobile phone based on the biometric information.* Further provided, for example, in claim 1, is *an interface section comprising an optical communications means for optically receiving/transmitting signals as the input/output signals,* ***disposed on a contact surface between the battery pack and the main body***.

It is respectfully submitted that Hoghooghi does not disclose or suggest the present invention as recited, for example, in claim 1. More specifically, Hoghooghi does not disclose or suggest a mobile phone having a battery pack wherein the ***user verification function verifies the identity of an authorized user*** *of the mobile phone based on the biometric information* as recited, for example, in the amended claim 1.

The Examiner asserts Hoghooghi discloses "...wherein the battery pack and the main body operate together to allow biometric (handwriting) information to be input to the main body

from outside the mobile phone for biometric verification purposes (by handwriting recognition engine 560) by being input to the battery pack through the I/O section..." However, it is clear that Hoghooghi does not disclose *the* ***user verification function verifies the identity of an authorized user*** *of the mobile phone based on the biometric information*, as recited in claim 1, for example.

The Examiner cites column 6, lines 25-43 to assert the Hoghooghi teaches user recognition, which the Examiner asserts is synonymous with user verification. (see page 4 of the Office Action). However, the cited passages discloses,

> "According to the preferred embodiment of the present invention, a trainable, or user dependent, system is used, in which the user first enters several examples of each character to be recognized for training the system to recognize the user's handwriting. The samples are stored and passed through the recognition engine 560 which compares the input via the comparator 562 to generate samples which correspond to readable characters or commands. Once the samples are stored, the system uses the comparator 562 to compare new inputs with the stored samples to determine which characters were traced or written on the digitizer 552 in step 608. A trainable system allows high recognition accuracy to be achieved for a particular user. " (see column 6, lines 25-43 of Hoghooghi).

Therefore, Hoghooghi only discloses a method for accepting sample handwritten digitized characters, which enables the processor to quickly recognize handwritten characters entered by the user. The recognition function taught by Hoghooghi is only used to train the system to recognize the user's handwriting, rather than verify the identity of an authorized user. Hoghooghi does not disclose a *user verification function that* ***verifies the identity of an authorized user*** *of a mobile phone based on the biometric information* entered into the battery pack as recited, for example, in claim 1.

Claim 1, for example, further recites *an optical communications means for optically receiving/transmitting signals as the input/output signals,* ***disposed on a contact surface between the battery pack and the main body.*** The Examiner concedes Hoghooghi fails to disclose that the interface section is an optical communication section which receives/transmits optical signals as the input/output signals. The Examiner relies on Muramatsu et al. (Muramatsu) to teach the deficiencies of Hoghooghi.

Muramatsu, however, does not disclose *an optical communication means...****disposed on a contact surface between the battery pack and the main body***, as recited in claim 1, for example. Muramatsu discloses a light guide and "the infrared optical communication interface

on the side face of the portable telephone is arranged so as to oppose the light guide. A surface of the light guide is established to be equal to or larger than an area of the side face of the portable telephone." (column 4, lines 35 - 44 and Fig. 5 of Muramatsu). Neither Muramatsu nor Hoghooghi discloses or suggests the interface section between a battery pack and a cell phone can be an optical communications means. The optical interface taught by Muramatsu is between a mobile telephone holding device and the mobile telephone itself. (see Abstract and column 2, lines 28-35 of Muramatsu). Muramatsu does not disclose or suggest an optical interface between the battery pack and the mobile phone. Therefore, Muramatsu does not disclose an optical communications means disposed on a contact surface between the battery pack and the main body, as recited in claim 1 for example.

Therefore, it would not have been obvious to one having ordinary skill in the art at the time the invention was made to modify the interface section of Hoghooghi with the optical communications section taught by Muramatsu because neither invention discloses or suggests *an optical communication means...**disposed on a contact surface between the battery pack and the main body***, as recited, for example, in claim 1.

Although the above comments are specifically directed to claim 1, it is respectfully submitted that the comments would be helpful in understanding various differences of various other claims over the cited references. In view of the above, it is respectfully submitted that the rejection is overcome.

III. CONCLUSION

In view of the above, it is respectfully submitted that the application is in condition for allowance, and a Notice of Allowance is earnestly solicited.

If any further fees are required in connection with the filing of this response, please charge such fees to our Deposit Account No. 19-3935.

Respectfully submitted,

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